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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

LIGHTFORCE USA, INC. d/b/a
NIGHTFORCE OPTICS and NIGHTFORCE
USA; and HVRT CORP.,

Plaintiffs,

v.

LEUPOLD & STEVENS, INC.,

Defendant.

Civil Case No.: 3:17-cv-01153-AC

**JOINT CLAIM
CONSTRUCTION CHART**

Pursuant to the Court's Scheduling Orders, Plaintiffs Lightforce USA, Inc. and HVRT Corp. (collectively "Nightforce") and Defendant Leupold & Stevens, Inc. ("Leupold"), by and through their attorneys of record, hereby submit the Joint Claim Construction Chart attached hereto as Exhibit A.

This Joint Claim Construction Chart sets forth the patents-in-suit, the numbers of the claims containing the disputed terms, the text of the disputed patent claim terms requiring construction, each party's proposed claim construction, and both side's citations to supporting intrinsic and extrinsic evidence.

The parties have reached agreement regarding the constructions of the following patent claim terms, and stipulate that the terms do not require any claim construction by the Court:

Term/Phrase	Patents: Claim(s)	Stipulated Claim Construction
Primary horizontal cross-hair	'595: 1 '806: 1,3,27,29 '608: 1,3,27,29	The most prominent horizontal cross-hair, which intersects with the primary vertical cross-hair
Secondary vertical cross-hair(s)	'595: 1 '806: 1,3,27,29 '608: 1,3,27,29	Vertical cross-hairs that are less prominent than primary cross-hairs, and that intersect at least one horizontal cross-hair
Secondary horizontal cross-hair(s)	'595: 1 '806: 1,3,27,29 '608: 1,3,27,29	Horizontal cross-hairs that are less prominent than primary cross-hairs, and that intersect at least one vertical cross-hair
Aiming point	'595: 1 '806: 1, 3, 27, 29 '608: 1, 3, 27, 29	A point on a reticle that helps a shooter aim at a target.
Intersects one and only one	'806: 1,3,27,29 '608: 1,3,27,29	Plain and ordinary meaning
Evenly spaced	'806: 1,27 '595: 1 '123: 1,85	Plain and ordinary meaning
Uninterrupted straight line	'806: 1,3,27,29	Plain and ordinary meaning
Quadrant	'595: 1	Any of four regions defined by the intersection of two perpendicular lines.

Defendants have alleged that the following terms of the '123 patent are indefinite:

Term/Phrase	Claim(s)
Lead markings	85
Intersection point comprises an open center	13, 97
Intersecting Intersection	1, 3, 13, 17, 22, 85, 87, 97, 110
Interrupted dot cross-hairs	1, 17, 22, 85
Secondary horizontal cross-hair(s)	1, 3, 13, 17, 22, 85, 87, 97,110

Term/Phrase	Claim(s)
Primary horizontal cross-hair	1, 3, 13, 17, 22, 85, 87, 97,110
Secondary vertical cross-hair(s)	1, 3, 13, 17, 22, 85, 87, 97,110
Primary vertical cross-hair	1, 3, 13, 17, 22, 85, 87, 97,110
Cross-hair	1, 3, 13, 17, 22, 85, 87, 97,110

The parties have agreed to defer claim construction of the terms alleged to be indefinite to a later date, and to have them addressed in the context of, for example, a motion for a summary judgment of indefiniteness.

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Respectfully submitted,

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